

Before the
Federal Communications Commission
 Washington, D.C. 20554

RECEIVED

JUL 26 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of) MM Docket No. _____
) RM- _____
 Amendment of Section 73.202(b)) RM- _____
 (Table of Allotments))
 FM Broadcast Stations)
)
Washington and Watkinsville, Georgia)

To: Chief, Mass Media Bureau
 Policy and Rules Division
 Allocations Branch

PETITION FOR RULE MAKING

Southern Broadcasting Companies, Inc. ("SBC"), by its attorneys, and pursuant to Section 1.420(i) of the Commission's Rules, hereby respectfully files this Petition for Rule Making to modify the Table of Allotments (47 C. F. R. §73.202 (b)) to change the allotment of FM Channel 261A from Washington, Georgia, to Watkinsville, Georgia, with a concurrent modification of the license of WXKT(FM), Washington (Facility ID No. 51120), to operate on Channel 261A at Watkinsville. In support whereof, the following is shown:

Background

1. WXKT, Channel 261A, Washington, Georgia, is licensed to Cumulus Licensing Corp. ("Cumulus"). On July 13, 2001, an application (File No. BALH-20010713AAO) was filed seeking seeking consent to assignment of license of WXKT to SBC. Section 21.14 of the agreement between Cumulus and SBC authorizes SBC to file petitions or other papers as deemed necessary by SBC to change the facilities of WXKT. In light of the usual period that elapses between the filing of a petition for rule making and the issuance of a notice of proposed rule

No. of Copies rec'd 074

List A B C D E

MMB01-157

making, SBC is filing this petition now in anticipation of its owning WXKT by the time comments would be due. If WXKT does not consummate the acquisition of WXKT, SBC will file comments withdrawing its proposal to modify the license of WXKT in this manner. SBC requests the Commission to delete Channel 261A from Washington and to reallocate it to Watkinsville, Georgia, with a concurrent modification of the license of WXKT to operate on Channel 261A at Watkinsville. This change is permissible under Section 1.420(i) of the Rules, which authorizes the Commission to modify the license or permit of an FM station to specify a new community of license where the amended allotment would be mutually exclusive with the licensee's present allotment.

2. Two factors must be demonstrated in order to change a station's city of license in a rule making proceeding: (1) the channel changes must be mutually exclusive, and (2) the rule making must not deprive a community of an existing service representing its only local transmission service. The Commission stated that in making the determination of whether to amend the Table of Assignments it would "take into account the totality of the service improvements resulting from a proposed change in community of license in determining whether an allotment proposal should be approved." *See Modification of FM and TV Authorizations (New Community of License)*, 4 FCC Rcd 4870 [66 RR 2d 877] (1989). SBC's proposal is consistent with the rules and Commission policies, i.e., the channel changes are mutually exclusive, and as shown *infra*, the rule making will not deprive Washington of its only local transmission service.

Expression of Continuing Interest

3. If the Commission allots Channel 261A to Watkinsville, SBC will promptly file an application for a minor change construction permit to operate WXKT at Watkinsville, and upon grant, will promptly construct and operate the facilities.¹

4. Attachment A is a Technical Exhibit, which is incorporated herein by reference, that provides the Commission with technical information about the proposed channel exchange at Washington and Watkinsville.

Washington, Georgia

5. According to the U.S. Census, Washington had a 1990 population of 4,279 persons. Washington has two commercial broadcast stations, WXKT(FM) and WLOV(AM)², also licensed to SBC. Thus, Washington will not be deprived of its only transmission service if the Commission reallocots Channel 261A to Watkinsville.

Watkinsville, Georgia

6. Watkinsville is listed in the U.S. Census as a town which had a 1990 population of 1,600. Watkinsville is located in Oconee County, Georgia, which had a 1990 population of 17,618. Watkinsville, founded in 1806, is today the county seat of Oconee County and according to the Town Clerk, is home to 2,291 people. The city's 32.6% population increase from the 1990 figures was among the largest in the state of Georgia and helped fuel a 39.2% increase in Oconee County's population of 24,526. The city's population is expected to continue

¹ The reallocation of WXKT from Washington to Watkinsville, Georgia, will result in the overlap of the principal community contours of other FM stations in which the principals of SBC currently have attributable interests. An appropriate showing of compliance with Section 73.3555 of the Rules will be made at the application stage.

² 1370 kHz, 1 kW days.

to increase in the coming years, as new residents move into Watkinsville, and as city leaders continue to annex outlying parcels of property in unincorporated Oconee County. The city of Watkinsville boasts a thriving commercial sector and an active downtown historic district, with nearly 200 licensed businesses. The city of Watkinsville municipal affairs are administered under a Mayor-Council form of government. The mayor and 5 City Council members set government policy and oversee the administrative functions as performed by 13 municipal employees. Watkinsville is protected on an around-the-clock basis by a fully-staffed police department and a city fire station. The United States Postal Service recently expanded its facilities in Watkinsville, giving residents a modern, state-of-the-art post office in a new stand-alone facility, with its own ZIP code, 30677. Colham Elementary School is in the city of Watkinsville. A Montessori school is scheduled to open the fall of 2001. In addition, the city is served by a satellite campus of Truett-McConnell College. The city's physically- and mentally-challenged youths enjoy the facilities of Extra Special People, Incorporated. Watkinsville has a large public library. Watkinsville's recreational facilities include city parks and ball fields. The city's 3,300-square-foot community center seats more than 200 people, and serves as a center for many of Watkinsville's entertainment and cultural activities. The spiritual needs of the residents of the city of Watkinsville are met by 19 houses of worship, and outlets for social expression are provided by several civic and social organizations. Therefore, Watkinsville possesses the requisite "social, economic and cultural components that are commonly associated with community status." See, FM Table of Allotments (East Hemet, CA), 67 RR 2d 146, 147 (1989). WXKT would bring first local service to Watkinsville, since Watkinsville currently does not have a local station. According to the technical exhibit, from the reference coordinates at **North Longitude 83° 52' 19"**, **West Longitude 83° 15' 19"** the proposed 70 dBu contour of WXKT

would not penetrate any designated urbanized area, and Watkinsville is not located in an urbanized area. Since no urbanized area is covered, there is no requirement to provide a showing pursuant to *Headland, Alabama, and Chattahoochee, Georgia*, 10 FCC Rcd 10342 (1995) that stations licensed to urbanized areas should not be attributed to Watkinsville. *See, Rose Hill, Trenton, Aurora and Ocracoke, North Carolina*, DA 96-2062, released December 13, 1996. Watkinsville warrants a first local service preference.

Section 307(b) Analysis

7. In determining which proposal will better serve the public interest, the Commission is guided by the allotment priorities set forth in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982). Under priority three, first local service, Watkinsville warrants a preference for bringing a first local service to Watkinsville over retaining WXKT in Washington as a second local service.

Other Public Interest Considerations

8. In changing its community of license, WXKT proposes to relocate its transmitter site. The allocation site meets all known constraints. The Engineering Exhibit demonstrates that the 1.0 mV/m contour of WXKT at Washington covers 1477.18 square kilometers, encompassing a population of 11,730 persons. WXKT operating at Watkinsville would cover 2,450.79 square kilometers and 155,056 persons. There would be a loss of service to 11,730 persons which is more than offset by a gain in service to 143,326 persons. The loss area is well served by 11 FM stations and 4 AM stations (a total of 15 stations). The Technical Exhibit indicates that there is no loss area resulting from the proposed WXKT change receiving fewer than five aural services. Therefore, the loss area is well-served. *See, FM Table of Allotments (Douglas, GA, et al.)*, 10 FCC Rcd 7706, 7707 (1995) (where loss area received service from at least five full-time

reception services, Commission found area to be "well-served"). See also *Wray and Otis, Colorado*, 13 FCC Rcd 2612 (1998). As noted above, since Washington will continue to enjoy service from WLOV, SBC's proposal will not deprive Washington of its only local transmission service. The Commission has made similar allotment changes where only a daytime AM station remained in a community. See *Johnstown and Altamont, New York*, 13 FCC Rcd 12463 (1998) [WIZR, Johnstown, operating with 1 kW day and 28 watts at night].

9. As shown in the attached Engineering Exhibit, Watkinsville would be entirely covered by a 70 dBu or better signal from WXKT. Thus, modification of the license for WXKT would be consistent with the Commission's city-grade contour coverage requirements.

10. The Commission's priorities for assigning FM allotments are set out in *Revision of FM Assignment Policies and Procedures, supra*. They are: (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). Here, as noted *supra* first local service to Watkinsville is greatly preferred to retaining two local services to Washington. Thus, there would a preferential arrangement of allotments resulting from the allotment of Channel 261A to Watkinsville.

WHEREFORE, SBC respectfully requests the Commission to amend Section 73.202(b) of the Commission's Rules, as follows:

| | <u>Georgia</u> | |
|--------------|----------------|------------------|
| | <u>Present</u> | <u>Proposed</u> |
| Washington | 261A | --- ³ |
| Watkinsville | --- | 261A |

³ WLOV(AM) is to remain licensed to Washington.

Conclusion

SBC requests the Commission to allot Channel 261A to Watkinsville, Georgia, and modify the license of WXKT to operate on FM Channel 261A at Watkinsville. If the Commission so modifies the license of WXKT, SBC will timely file an application for minor change construction permit to operate WXKT at Watkinsville, and upon grant thereof, SBC will construct the new facilities and operate them.

Respectfully submitted,

**SOUTHERN BROADCASTING
COMPANIES, INC.**

By: 

Gary S. Smithwick
Its Attorney

SMITHWICK & BELENDIUK, P.C.

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(202) 363-4050

July 26, 2001

ATTACHMENT A

SOUTHERN BROADCASTING COMPANIES, INC.
WXKT(FM)
WASHINGTON, GA - WATKINSVILLE, GA.

The Following technical exhibit and statement has been prepared on behalf of Southern Broadcasting companies, Inc., the proposed assignee of WXKT. An application for license transfer has been filed with the Commission. The purpose is the show that WXKT does meet all criteria as set forth in Federal Communications Commission rules related to the proposed change in city of license.

Watkinsville, Georgia presently does not employee any local service. This proposal will offer first local service to Watkinsville.

Watkinsville, located in Oconee county, Georgia, is an Incorporated city and the county seat of Oconee County with a fully active city government.. Watkinsville is not located within any designated urbanized area. The proposed 70 dBu contour for WXKT will not penetrate any designated urbanized area. According to the 2000 Census data, The population of Watkinsville is 2,097 persons.

Exhibit-1 is a spacing study from the proposed new site for WXKT. This exhibit clearly shows that the proposed site is fully spaced to any other operating or proposed FM facility.

Exhibit-2 is a visual plot showing the proposed city of license, Watkinsville, Georgia, and the 70 dBu (3.16 mV/m) contour from WXKT's proposed site.

Exhibit-2A is a close view showing the 70 dBu Contour and the city of Watkinsville.

Exhibit-3 is a list of facilities that presently serve Washington before and after the proposed change. Washington will continue to receive broadcast service from WLOV(AM), WLOV operates at 1370 kHz, 1000 Watts non-directional, daytime.

The total population gained and lost, within the 60 dBu contour, is outlined as follows:

Total population within proposed contour - 155,056 persons.

Total area with the proposed contour - 2450.79 sq km.

Total population within present contour - 11,730 persons

Total area with the present contour - 1477.18 sq km.

Total persons lost - 11,730 persons

Total persons gained by proposal - 143,326

Exhibit-4 is a visual plot showing the proposed 1.0 mV/M (60 dBu) contour, the population, and area within that contour. This exhibit clearly shows that the public interest would be better served by granting this proposal.

**SOUTHERN BROADCASTING COMPANIES, INC.
WXKT(FM)
WASHINGTON, GA - WATKINSVILLE, GA.**

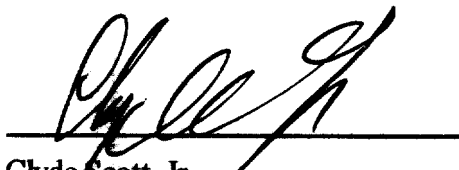
Exhibit's 5 and 5C are visual plots showing the FM (5) and AM (5C) facilities who's contours penetrate the proposed gain area. A Total of 26 services, 14 AM and 12 FM presently present service to the some 155,056 persons within the gain area. Exhibits 5B and 5D are lists of the plotted stations.

Exhibits 6 and 6C show that Washington is presently served by 15 other AM and FM facilities. A total of 11 FM's and 4 AM's will continue to present service to the some 11,730 persons within the loss area. Exhibits 6B and 6D are lists of the plotted stations. These calculations were preformed using the 1.0 mV/m f 50:50 contours for FM and the .5 (1/2) mV/m AM contour.

Exhibit - 7 is a line-of-site showing from the proposed site to the city of Watkinsville.

CONCLUSION

Southern Broadcasting Companies, Inc. proposes to relocate the transmitter of radio station WXKT (FM) and designate Watkinsville, Georgia as the city of license. The attached technical statement and exhibits, in support of this proposal clearly show the public interest would be better served by granting the proposal. Once granted, Cumulus Licensing, Corp. will prepare, and file, FCC Form 301 to request a construction permit to move the transmitter of WXKT.



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EME Communications
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Moultrie, Georgia, 31768
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912-985-0864 Fax
cscott@emecom.com

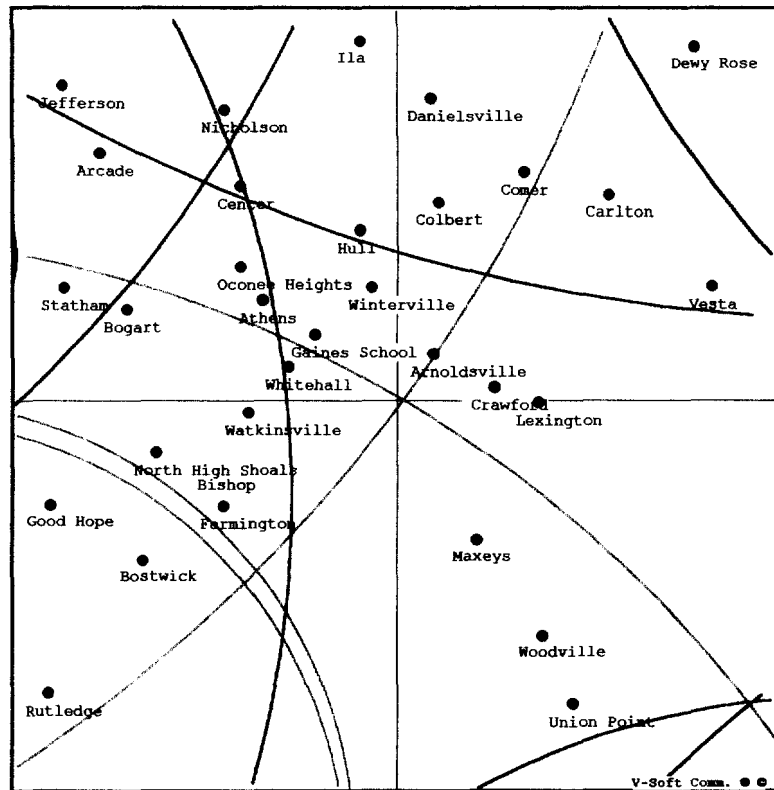
EXHIBIT - 1
WKXT AT WATKINSVILLE, GA.

FMCONT^(TM) LOCATE STUDY

Ch 261 A
100.1 MHz

N. Lat. 33 52 19

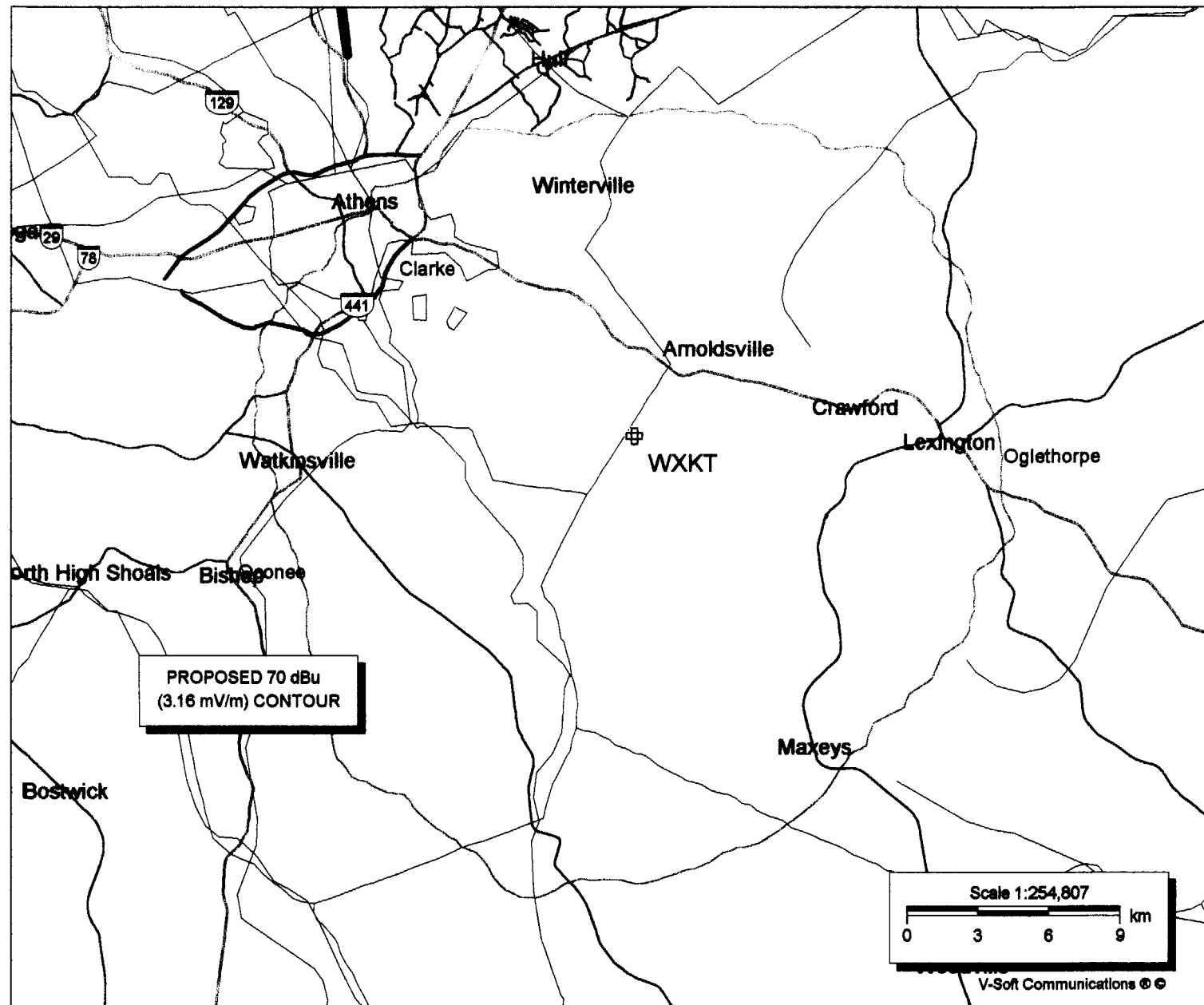
W. Lng. 83 15 19



| Call | CH# | Location | | D-KM | Azi | FCC | Margin |
|--------|-------|---------------|----|--------|-------|-------|--------|
| WXKT | 261A | Washington | GA | 52.03 | 107.5 | 115.0 | -62.97 |
| WNSY.A | 261C3 | Talking Rock | GA | 141.60 | 306.9 | 142.0 | -0.40 |
| ALLO | 261C3 | Talking Rock | GA | 141.60 | 306.9 | 142.0 | -0.40 |
| WQMJ | 261A | Forsyth | GA | 114.68 | 209.8 | 115.0 | -0.32 |
| WNNX | 259C* | Atlanta | GA | 105.42 | 264.9 | 95.0 | 10.42 |
| WKSF | 260C | Asheville | NC | 178.31 | 14.6 | 165.0 | 13.31 |
| RADD | 264C3 | Social Circle | GA | 62.45 | 227.5 | 42.0 | 20.45 |
| RADD | 264C3 | Covington | GA | 64.13 | 226.8 | 42.0 | 22.13 |
| WNSY | 261A | Talking Rock | GA | 141.60 | 306.9 | 115.0 | 26.60 |
| WNSY.C | 261A | Talking Rock | GA | 141.60 | 306.9 | 115.0 | 26.60 |
| WSSLFM | 263C* | Gray Court | SC | 130.92 | 53.2 | 95.0 | 35.92 |
| WSNTFM | 260A | Sandersville | GA | 107.96 | 157.4 | 72.0 | 35.96 |
| WYFW | 208A | Winder | GA | 48.03 | 286.4 | 10.0 | 38.03 |
| WMCD | 261C2 | Statesboro | GA | 209.19 | 138.4 | 166.0 | 43.19 |
| WWWQ.A | 263C2 | College Park | AL | 105.68 | 263.5 | 55.0 | 50.68 |
| RADD | 264A | Haddock | GA | 83.04 | 187.8 | 31.0 | 52.04 |
| RDEL | 264A | Milledgeville | GA | 84.13 | 177.7 | 31.0 | 53.13 |
| RDEL | 264A | Milledgeville | GA | 84.13 | 177.7 | 31.0 | 53.13 |
| WLRR | 264A | Milledgeville | GA | 84.13 | 177.7 | 31.0 | 53.13 |
| WWWQ | 263C3 | College Park | AL | 105.68 | 263.5 | 42.0 | 63.68 |
| WKXCFM | 258C2 | Aiken | SC | 125.39 | 101.2 | 55.0 | 70.39 |
| ALLO | 263C2 | Anniston | AL | 128.97 | 251.1 | 55.0 | 73.97 |
| RADD | 263C3 | College Park | GA | 116.19 | 264.1 | 42.0 | 74.19 |

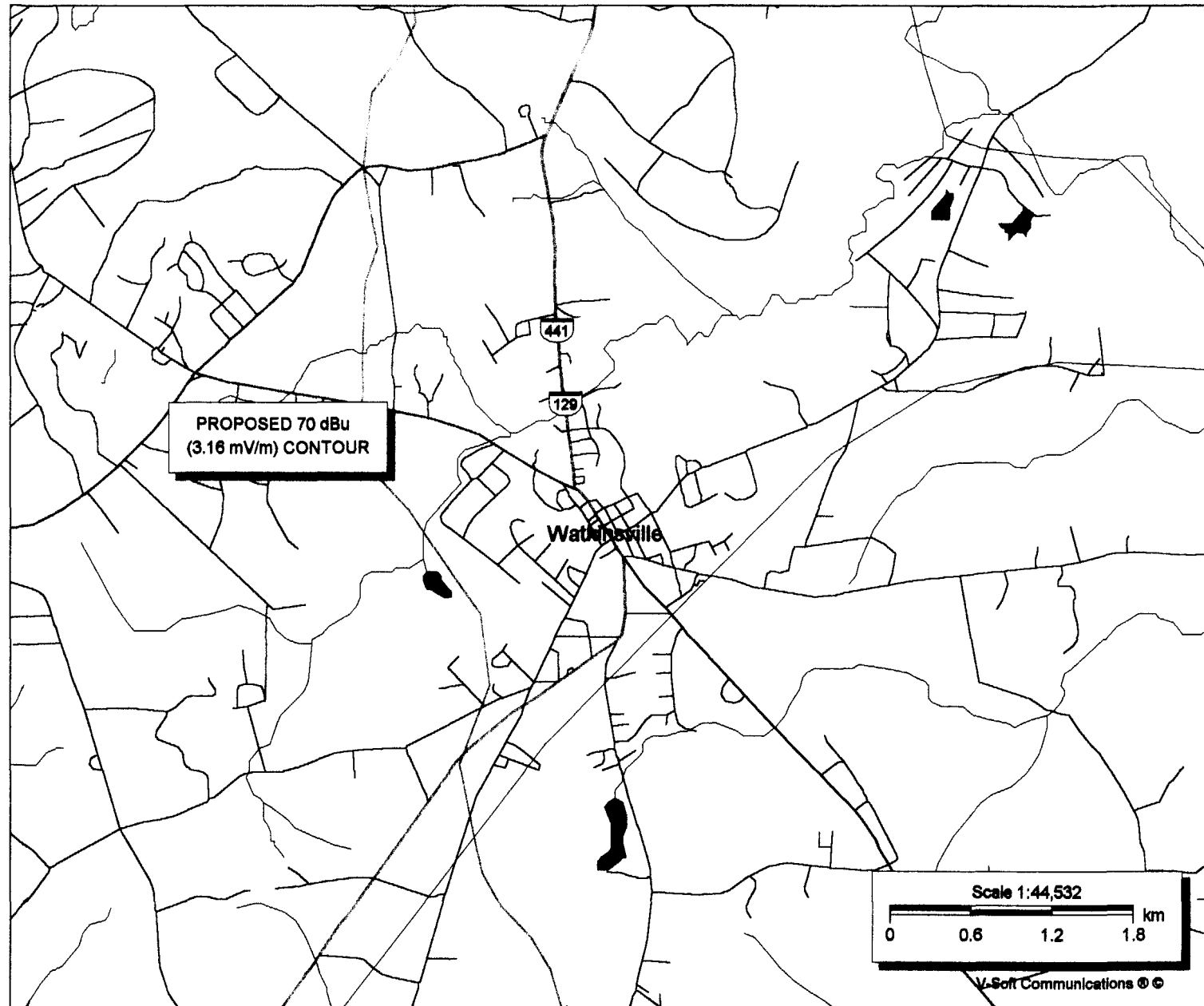
WXKT
BLH7093
Latitude: 33-52-19 N
Longitude: 083-15-19 W
Power: 6.00 kW
Channel: 261
Frequency: 100.1 MHz
AMSL Height: 300.851 m
Elevation: 190.42 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

EXHIBIT - 2



WXKT
BLH7093
Latitude: 33-52-19 N
Longitude: 083-15-19 W
Power: 6.00 kW
Channel: 281
Frequency: 100.1 MHz
AMSL Height: 300.851 m
Elevation: 190.42 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

EXHIBIT - 2A



**SOUTHERN BROADCASTING COMPANIES, INC.
WXKT(FM)
WASHINGTON, GA - WATKINSVILLE, GA.**

EXHIBIT - 3

**FACILITIES
BEFORE AND AFTER
PROPOSED CHANGE**

WASHINGTON

WATKINSVILLE

BEFORE

WLOV(AM) - 1370 KHz - 1000W ND/D
WXKT(FM) Ch-261A

NONE

AFTER

WLOV(AM) - 1370 KHz - 1000W ND/D

WXKT(FM) Ch-261A

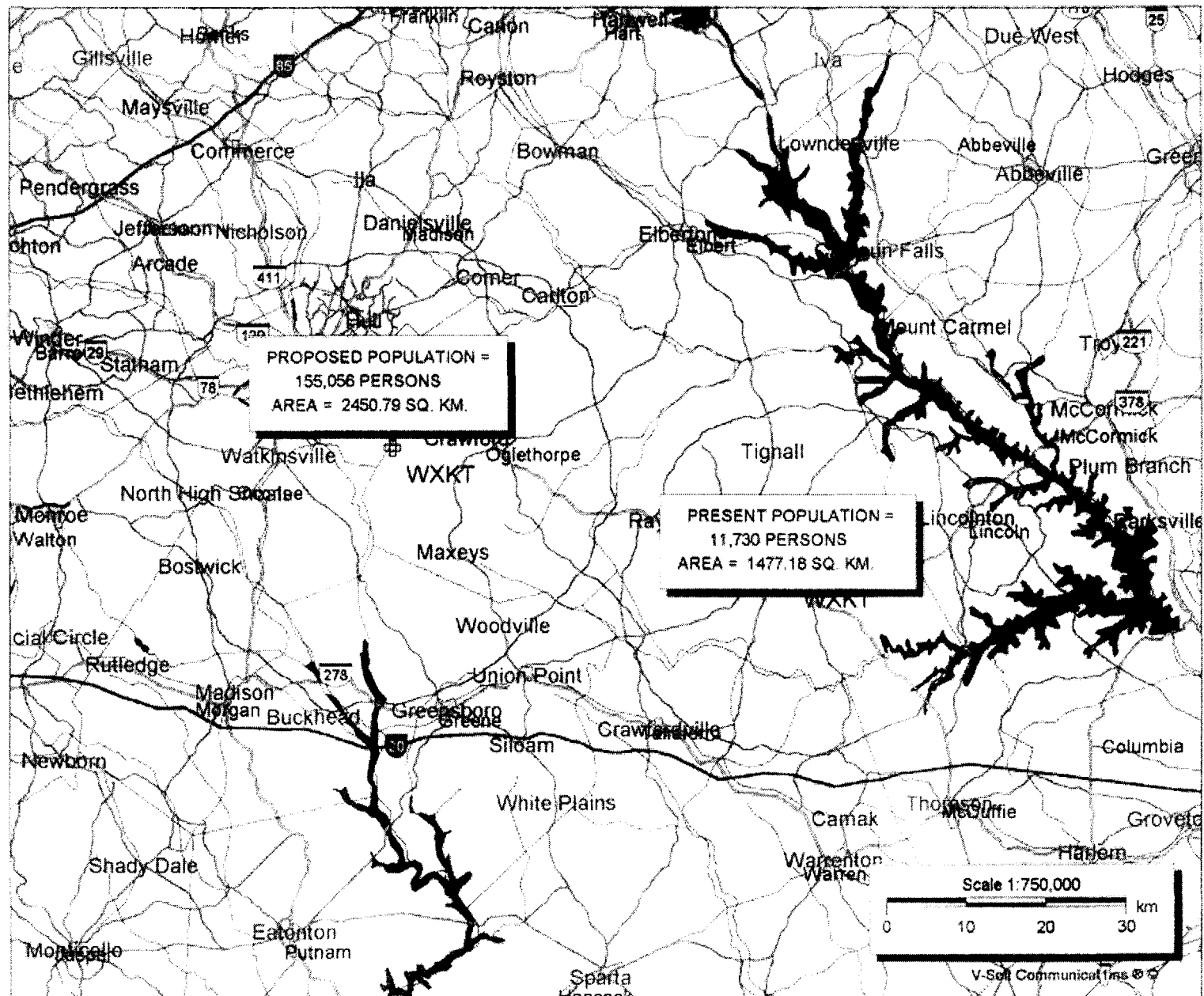
PROPOSED

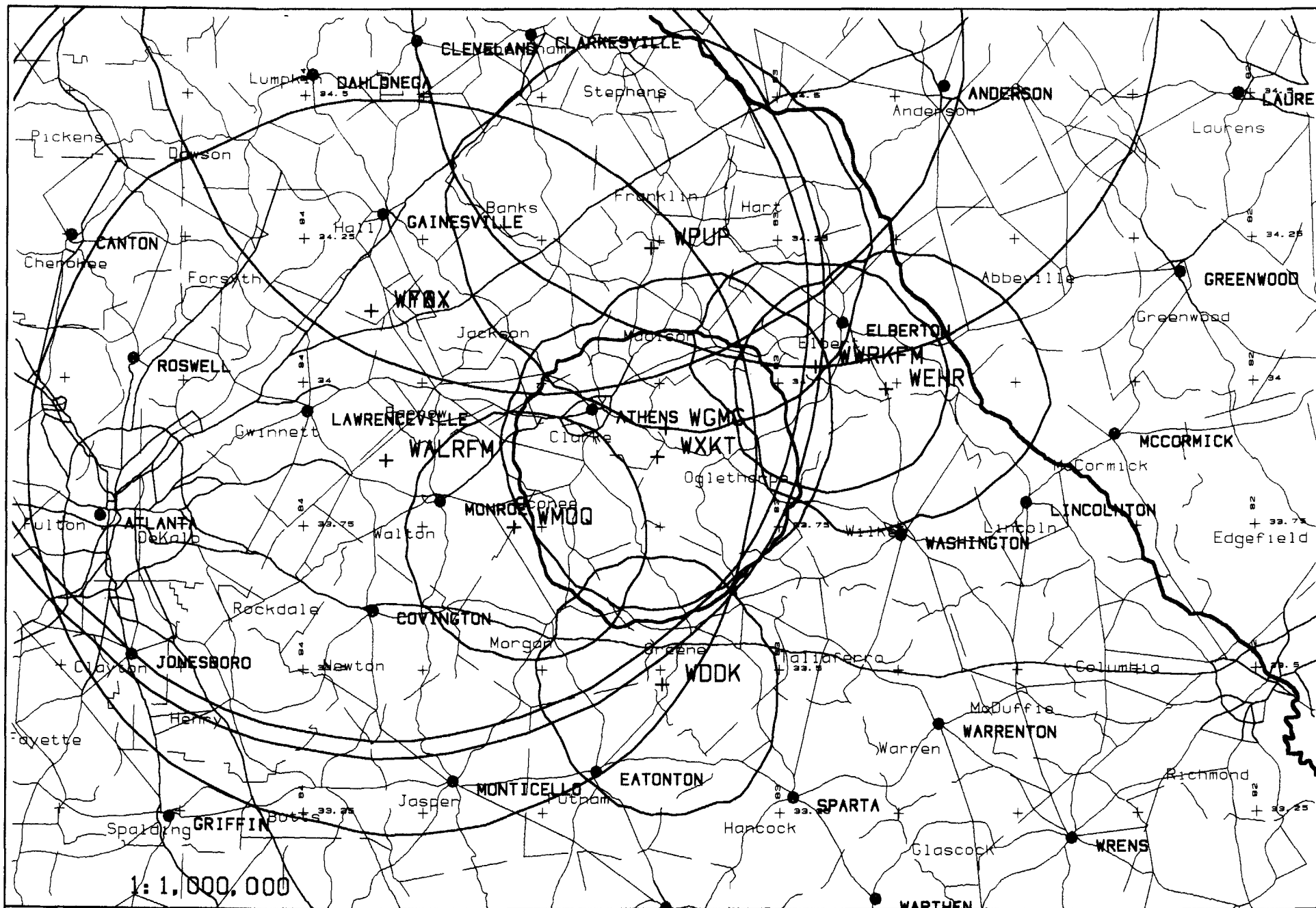
WXKT
 BLH7093
 Latitude: 33-52-19 N
 Longitude: 083-15-19 W
 Power: 6.00 kW
 Channel: 261
 Frequency: 100.1 MHz
 AMSL Height: 300.851 m
 Elevation: 190.42 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None

PRESENT

WXKT
 BLH7093
 Latitude: 33-43-50 N
 Longitude: 082-43-10 W
 Power: 2.40 kW
 Channel: 261
 Frequency: 100.1 MHz
 AMSL Height: 240.0 m
 Elevation: 183.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None

EXHIBIT - 4





| | | |
|--|--|--|
| <p>Scale in km</p> <p>0 10 20 30 40 50 60 70</p> | <p>WXKT 261A 6kW 300.86M AMSL</p> <p>N. Lat. 33 52 19 W. Lng. 83 15 19</p> | <p>WXKT PROPOSED FM'S</p> <p>EXHIBIT - 5</p> |
|--|--|--|

Duopoly Study


Center = 33 52 19 N, 83 15 19 W

06-19-2001

| Call | Coordinates | Dist. | Bear. | Chan. | Pwr. | City | State | File # |
|--------|---------------|-------|-------|-------|------|-------------|-------|-------------|
| *WXKT | 3352 g 83151 | 0 | 0 | 261 | 6 | | | 831519 |
| WALRFM | 335156 834934 | 52.8 | 269.4 | 284C1 | 100 | Athens | GA | BLH890707KA |
| WDDK | 332829 831446 | 44.1 | 178.9 | 280A | 3 | Greensboro | GA | BLH910913KA |
| WEHR | 335922 824623 | 46.5 | 73.5 | 286A | 6 | Elberton | GA | BLH980521KC |
| WFOX | 340732 835132 | 62.5 | 297 | 246C | 100 | Gainesville | GA | BLH980825KB |
| WGMG | 335518 831414 | 5.8 | 16.8 | 271C3 | 10 | Crawford | GA | BLH960626KB |
| WMOQ | 334458 833330 | 31.2 | 244.1 | 222A | 3 | Bostwick | GA | BLH940930KC |
| WPEK | 344115 825913 | 93.8 | 15.1 | 251C | 100 | Seneca | SC | BLH980629KB |
| WPUP | 341413 831603 | 40.5 | 358.4 | 279C3 | 25 | Royston | GA | BLH920113KD |
| WSTEFM | 344346 832929 | 97.6 | 347.3 | 291C | 100 | Toccoa | GA | BLH860610KA |
| WWRKFM | 340145 825516 | 35.5 | 60.3 | 221A | 3 | Elberton | GA | BLH6027 |
| WYAY | 340732 835132 | 62.5 | 297 | 294C | 100 | Gainesville | GA | BLH970701KZ |

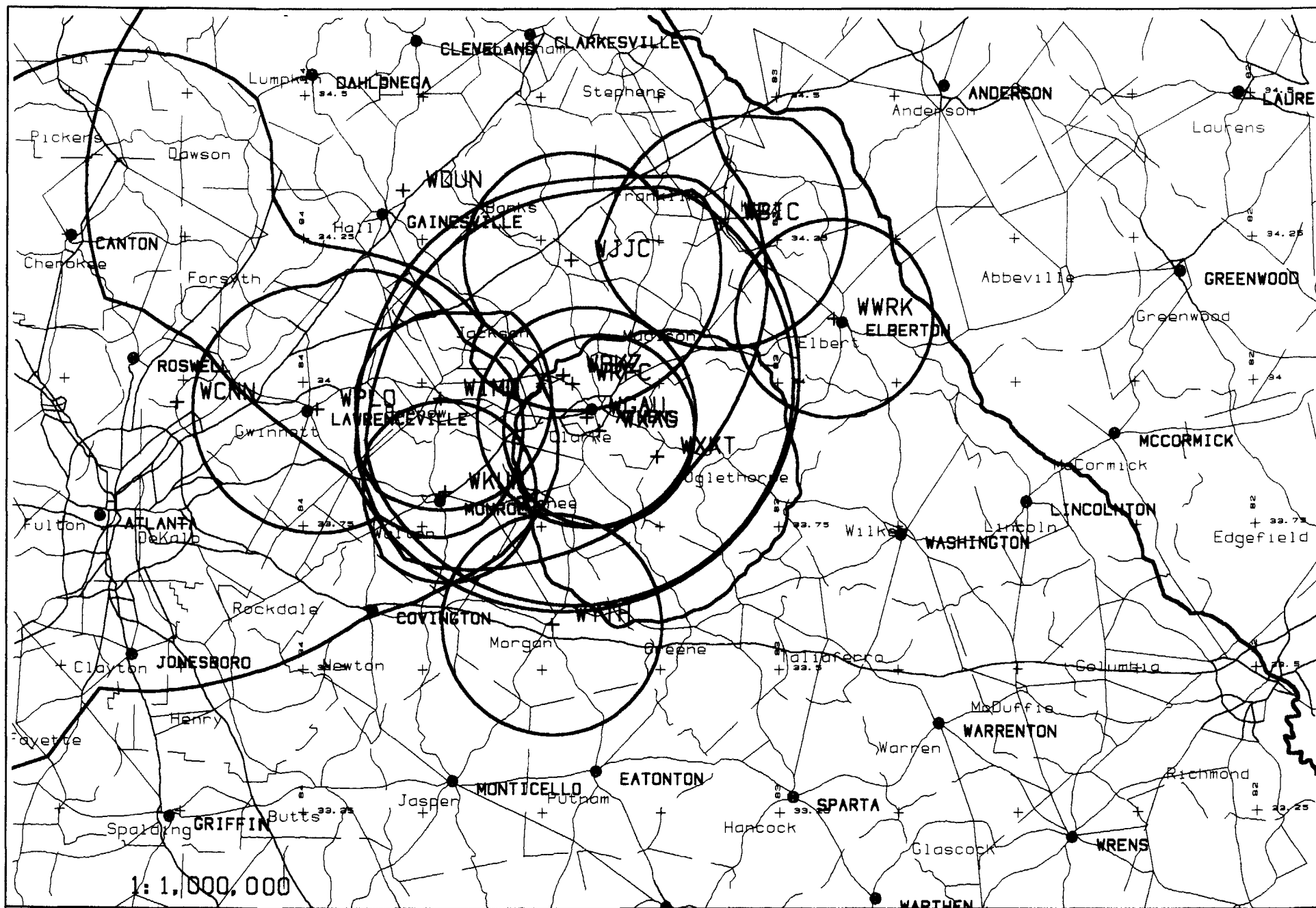
Number in list= 12

EXHIBIT - 5B**FMS WITHIN PROPOSED CONTOUR**

EME  **PROFESSIONAL ENGINEERING SERVICES
FOR THE PROFESSIONAL BROADCASTER**

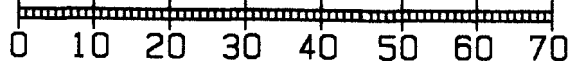
COMMUNICATIONS

293 JC SAUNDERS ROAD
MOULTRIE, GEORGIA. 31768
(912)890-2506 (912)985-0864 Fax



1:1,000,000

Scale in km



WXKT 261A 6kW 300.86M AMSL
N. Lat. 33 52 19 W. Lng. 83 15 19

WXKT PROPOSED AM'S
EXHIBIT - 5C

Duopoly Study

Center = 33 52 19 N, 83 15 19 W


06-19-2001

| Call | Coordinates | Dist. | Bear. | Chan. | Pwr. | City | State | File # |
|-------|---------------|-------|-------|-------|------|---------------|-------|------------|
| *WXKT | 3352 g 83151 | 0 | 0 | 261 | 6 | | | 831519 |
| WBIC | 341650 830709 | 47 | 15.4 | 0810 | 0.2 | ROYSTON | GA | BL890105AC |
| WBKZ | 340052 832711 | 24.2 | 311 | 0880 | 5 | JEFFERSON | GA | BL861027AJ |
| WCNN | 335742 841548 | 93.8 | 276.4 | 0680 | 50 | NORTH ATLANTA | GA | BL851031AJ |
| WDUN | 342008 834732 | 71.4 | 316.3 | 0550 | 10 | GAINESVILLE | GA | BL970401AM |
| WGAU | 335628 832413 | 15.7 | 299.4 | 1340 | 1 | ATHENS | GA | |
| WIMO | 335822 834240 | 43.6 | 285.1 | 1300 | 1 | WINDER | GA | |
| WJJC | 341257 832609 | 41.6 | 336.5 | 1270 | 5 | COMMERCE | GA | BL820419AF |
| WKUN | 334837 834201 | 41.8 | 260.7 | 1580 | 1 | MONROE | GA | |
| WPLO | 335711 835815 | 66.8 | 278 | 0610 | 1.5 | GRAYSON | GA | BL900815AH |
| WRFC | 335958 832600 | 21.7 | 310.8 | 0960 | 5 | ATHENS | GA | BL860624AA |
| WWRK | 340645 825252 | 43.7 | 52.1 | 1400 | 1 | ELBERTON | GA | |
| WXAG | 335503 832239 | 12.4 | 294.2 | 1470 | 1 | ATHENS | GA | |
| WYTH | 333445 832840 | 38.5 | 212.4 | 1250 | 1 | MADISON | GA | |

Number in list= 14

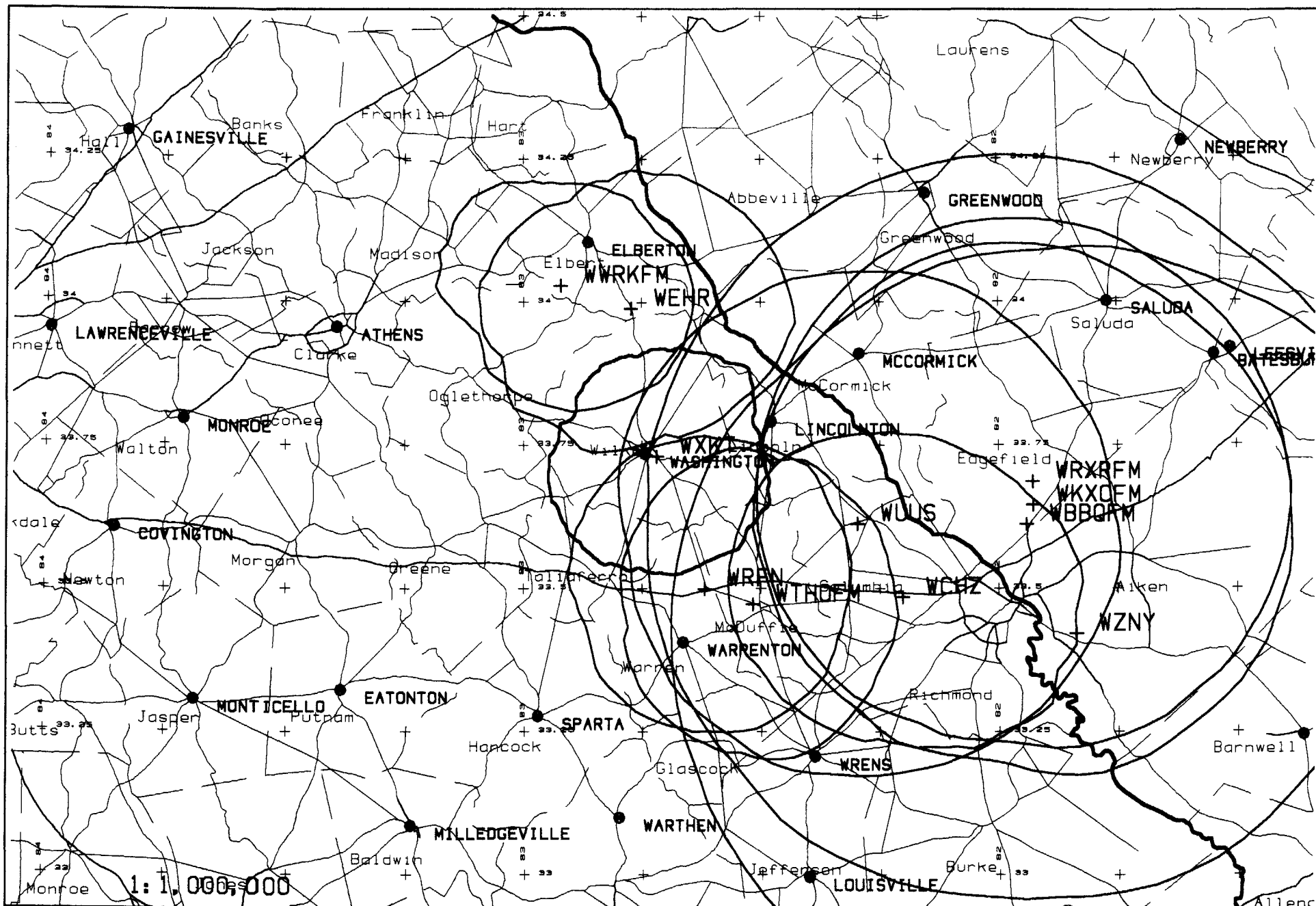
EXHIBIT - 5D

AMS WITHIN PROPOSED CONTOUR

EME  PROFESSIONAL ENGINEERING SERVICES
FOR THE PROFESSIONAL BROADCASTER

COMMUNICATIONS

293 JC SAUNDERS ROAD
MOULTRIE, GEORGIA 31768
(912)890-2506 (912)985-0864 Fax



| | | |
|--------------------|--|--|
| <p>Scale in km</p> | <p>WXKT 261A 2.4kW 240M AMSL N. Lat. 33 43 50 W. Lng. 82 43 10</p> | <p>WXKT PRESENT FM'S EXHIBIT - 6</p> |
|--------------------|--|--|

Duopoly Study

Center = 33 43 50 N, 82 43 10 W

06-19-2001

| Call | Coordinates | Dist. | Bear. | Chan. | Pwr. | City | State | File # |
|--------|---------------|-------|-------|-------|------|-----------|-------|-------------|
| *WXKT | 3343 g 82431 | 0 | 0 | 261 | 2 | | | 824310 |
| WBBQFM | 333642 815630 | 73.3 | 100.2 | 282C | 100 | Augusta | GA | BLH830216AJ |
| WCHZ | 332907 821207 | 55.2 | 119.5 | 236C3 | 5.7 | Harlem | GA | BLH940415KB |
| WEHR | 335922 824623 | 29.1 | 350.3 | 286A | 6 | Elberton | GA | BLH980521KC |
| WKXCFM | 333844 815540 | 74 | 97.1 | 258C2 | 22.5 | Aiken | SC | BLH880531KB |
| WRFN | 332959 823709 | 27.2 | 160.1 | 226A | 4.1 | Warrenton | GA | BLH970811KB |
| WRXRFM | 334110 815543 | 73.5 | 93.6 | 242C2 | 15 | Aiken | SC | BLH880728KB |
| WTHOFM | 332820 823102 | 34.3 | 146.8 | 269A | 5.1 | Thomson | GA | BLH950215KB |
| WUUS | 333647 821751 | 41.2 | 108.4 | 299C2 | 24.5 | Martinez | GA | BLH940421KB |
| WWRKFM | 340145 825516 | 38 | 330.8 | 221A | 3 | Elberton | GA | BLH6027 |
| WZNY | 332515 815019 | 88.7 | 112.6 | 289C | 100 | Augusta | GA | BLH910705KB |

Number in list= 11

EXHIBIT - 6B

FMS WITHIN PROPOSED CONTOUR

EME PROFESSIONAL ENGINEERING SERVICES
FOR THE PROFESSIONAL BROADCASTER**COMMUNICATIONS**293 JC SAUNDERS ROAD
MOULTRIE, GEORGIA 31768
(912)890-2506 (912)985-0864 Fax

Duopoly Study

Center = 33 43 50 N, 82 43 10 W

06-19-2001

| Call | Coordinates | Dist. | Bear. | Chan. | Pwr. | City | State | File # |
|-------|---------------|-------|-------|-------|------|------------|-------|------------|
| *WXKT | 3343 g 82431 | 0 | 0 | 261 | 2 | | | 824310 |
| WGAC | 333041 820444 | 64.2 | 112.2 | 0580 | 5 | AUGUSTA | GA | |
| WLOV | 334350 824310 | 0 | 0 | 1370 | 1 | WASHINGTON | GA | |
| WTWA | 332820 823102 | 34.3 | 146.8 | 1240 | 1 | THOMSON | GA | BL800728AG |

Number in list= 4

EXHIBIT - 6D

AMS WITHIN PROPOSED CONTOUR

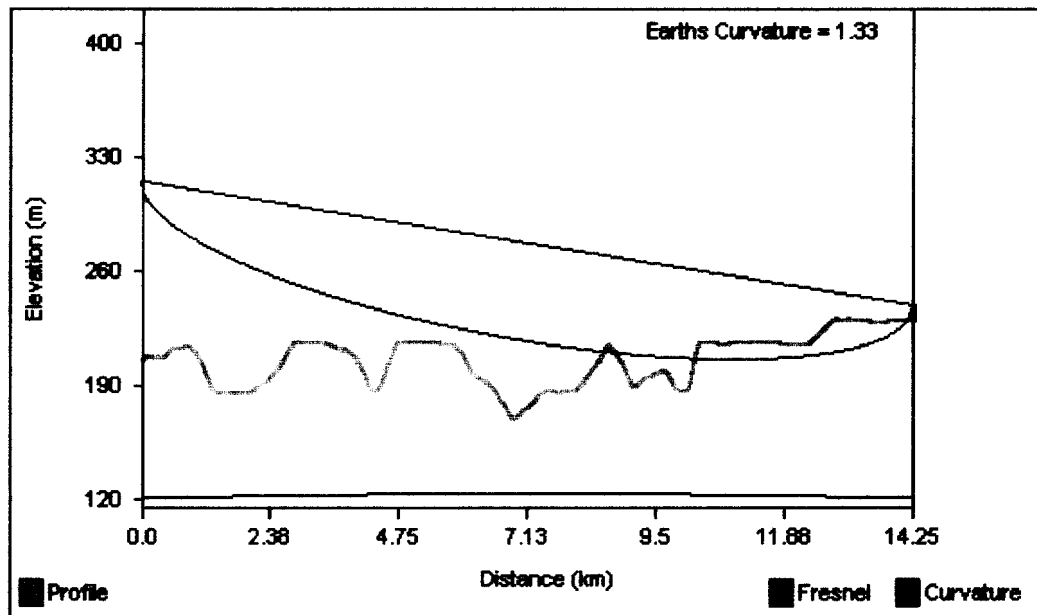
EME  PROFESSIONAL ENGINEERING SERVICES
FOR THE PROFESSIONAL BROADCASTER
COMMUNICATIONS

293 JC SAUNDERS ROAD
MOULTRIE, GEORGIA 31768
(912)890-2506 (912)985-0864 Fax

SOUTHERN BROADCASTING COMPANIES, INC.
WXKT(FM)
WASHINGTON, GA - WATKINSVILLE, GA.

EXHIBIT - 7

LINE-OF-SIGHT SHOWING



DECLARATION AND QUALIFICATIONS OF PREPARER

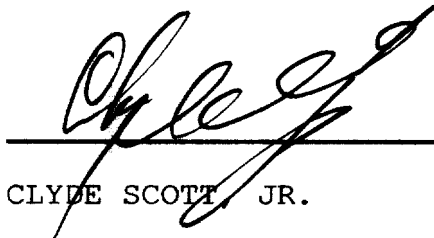
STATE OF GEORGIA)
CITY OF MOULTRIE)
COLQUITT COUNTY)

§

CLYDE SCOTT, JR. ,UNDER PENALTY OF PERJURY, DECLARES AND SAYS
HE IS A BROADCAST ENGINEER AND PRESIDENT OF EME COMMUNICATIONS.
HE HAS BEEN ENGAGED TO PREPARE THE ATTACHED TECHNICAL EXHIBIT.

THAT HIS QUALIFICATIONS ARE A MATTER OF RECORD BEFORE THE FEDERAL
COMMUNICATIONS COMMISSION AND HAS BEEN ACTIVE IN THE BROADCAST
INDUSTRY SINCE 1965 AND IN BROADCAST ENGINEERING SINCE 1972. THAT
HE IS THE HOLDER OF GENERAL RADIOTELEPHONE LICNESE NO. PG-6-30133.

THAT THE ATTACHED TECHNICAL EXHIBIT WAS EITHER PREPARED BY HIM
OR UNDER HIS DIRECT SUPERVISION. ALL MATERIAL AND EXHIBITS HERETO
ARE BELIEVED TO BE TRUE AND CORRECT.



CLYDE SCOTT, JR.